



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
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San Francisco, CA 94105

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December 14, 1995

Mr. Mike McClelland
Department of the Navy
Engineering Field Activity, West
900 Commodore Drive, Code 62.3
San Bruno, CA 94066-5006

Subject: Human Health Risk Assessment Approach for Parcel B,
Hunters Point Naval Shipyard

Dear Mr. McClelland:

The purpose of this letter is to reiterate EPA's position regarding the human health risk assessment approach for Parcel B. The Navy presented the human health risk assessment approach for Parcel B at the October 18, 1995 meeting and asked EPA and the State of California toxicologists to comment on the proposed approach which was to be included in the draft Parcel B RI Report due to the Agencies by January 31, 1996.

EPA's toxicologist reviewed the risk assessment approach in conjunction with the State's toxicologist and presented verbal comments, supported by both EPA and the State, to PRC's toxicologist, Pinaki Benerjee, on November 3, 1995. In addition, the State toxicologist submitted written comments on the risk assessment approach in a Memorandum dated November 15, 1995. In the comments provided, EPA and the State requested that the residential risk scenario should either: 1) use the site specific parcel size of 2500 ft² based on the average residential lot size for the City of San Francisco or 2) calculate point estimates of risk or hazard and associated isopleths of equal risk or hazard.

During the December 5, 1995 meeting, the Navy indicated that they are not in agreement with the comments submitted by EPA and the State and are planning to submit the human health risk assessment using a 0.5 acre exposure area lot size for both the industrial and residential scenarios. The Navy proposed an option of calculating the residential risk using the 2500 ft² exposure area lot size at one of the 0.5 acre lot size location grids for comparative purposes. While we agree that this would provide some useful information, provided the appropriate grid is selected, we still believe that the 2500 ft² lot size is a defensible, site relevant number that should be used in the

future use residential scenario rather than the 0.5 acre lot size. Using the site specific lot size will assist the Navy and the City in making decisions regarding future reuse and will help focus remediation efforts.

In addition, the Navy also proposed calculating the residential scenario using the 2500 ft² lot size only in those areas designated by the reuse authority as being mixed-use areas. This proposal is acceptable, however, should the reuse authority decide to propose mixed use in other areas of Parcel B, the Navy would need to re-calculate the risk values for those areas. It would appear to be in the Navy's best interest to calculate residential (or mixed use) risk values for the entire parcel now to avoid an additional effort later in the process.

EPA is concerned that the Navy has decided to submit the Human Health Risk Assessment for Parcel B without incorporating the comments provided by EPA and the State. This will result in the Agencies submitting the same comments on the draft document that were already provided to the Navy in advance of the document preparation. The Navy will then have to redo the risk assessment resulting in a costly and unnecessary duplication of effort. As the draft RI Report is not due until January 31, 1996, we would strongly suggest that the Navy incorporate our comments prior to submittal of the draft report.

We would be happy to meet with the Navy to resolve this issue prior to finalization of the Parcel B draft RI Report. If you have any questions or comments regarding this letter, please contact me at (415) 744-2410.

Sincerely,



Sheryl Lauth
Remedial Project Manager

cc: Dan Stralka, Ph.D., EPA
Jane Diamond, EPA
Cyrus Shabahari, DTSC
Jim Polisini, DTSC
Richard Powell, Navy